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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: March 6, 2015

March 5, 2015

VIA ECF AND EMAIL
(Failla_NYSDChambers@nysd.uscourts.gov)

Hon. Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
40 Foley Square - Room 2103
New York, New York 10007

re: Forni v. Resnick
Case No. 1:14-cv-09458-KPF
request for a short continuance

MEMO ENDORSED

Dear Judge Failla:

I am counsel for the Plaintiff Nicole Forni in this action. Pursuant to Rule 3E of Your Individual Rules of Practice in Civil Cases, this is a request for a short continuance to file our response to the motions to dismiss/motion for judgment on the pleadings. Our response due date is currently March 9, 2015. We are seeking an extension to March 27, 2015.

My associate Ronald Annotico has an immediate family member who has been hospitalized, and this event has taken sufficient personal time from his professional calendar. Mr. Annotico is the primary drafter of the briefs in opposition.

I have contacted counsel for the defendants, and I believe none of them have any objection to this request.

We of course would be willing to agree to a corresponding extension of time for the defendants to file their reply briefs.

This is our first request for an extension of time for our brief in opposition.

Thank you.

Sincerely,

/s/ Michael J. O'Shea

Michael J. O'Shea
(OH bar# 0039330 - admitted pro hac vice)

cc: to all counsel of record by email
to all parties by ECF System

Application GRANTED. Plaintiff's response is due March 27, 2015. Defendants' replies are due April 17, 2015. No further extensions shall be granted absent good cause shown. The Clerk of Court is directed to terminate the letter motion pending at docket entry 137.

Dated: March 6, 2015
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE